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August 10, 2017

Regional Freedom of Information Officer U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105

Re: Freedom of Information Act Request - San Fernando Valley Superfund Site

To Whom This May Concern:

Pursuant to the Freedom of Information Act, 5 U.S.C. Section 552 ("FOIA"), Los Angeles By-Products Co. ("LABP") hereby requests that U.S. EPA, Region 9 ("EPA") provide LABP, through its undersigned counsel of record, with copies¹ of the following documents referring to or relating to the San Fernando Valley Superfund Site, North Hollywood Operable Unit or Burbank Operable Unit ("Site"):²

- 1. Any and all documents referring to or relating to any estimate, calculation, opinion, or allocation of liability or costs at the Site which EPA or any other party presently attributes to LABP.
- 2. Any and all allocation models, including underlying data, studies, evaluations, and reports, created in the past ten (10) years that identify any estimate, calculation, opinion, or allocation of liability or costs at the Site which EPA or any other party presently attributes to LABP.
- 3. Any and all documents created in the past ten (10) years that consist of, refer to, or relate to communications regarding LABP between EPA, regulatory agencies, municipalities, potentially responsible parties at the Site, and/or the Los Angeles Department of Water and Power.
- 4. A copy of or access to EPA's current Site database of documents in electronic format (including updates thereto).

The foregoing request includes electronically stored information (ESI) as well as hard copies of documents. LABP agrees to reimburse EPA up to \$100 for the reasonable cost of identifying, scanning, and/or duplicating records. If EPA anticipates that costs are likely to exceed that amount, please contact me to discuss in advance.

¹ Electronic copies are preferred if they can be made available.

² For reference, please see https://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/ViewByEPAID/CAD980894893

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LABP understands that federal agencies are required to respond to FOIA requests within twenty working days, excluding Saturdays, Sundays, and legal holidays. Please comply with this requirement or let me know in advance if an extension is needed.

LABP further understands that if EPA elects to withhold information responsive to this FOIA request based on an applicable exemption or exclusion, EPA is required to supply a determination letter explaining any basis it believes it has for withholding information. Moreover, if any information is withheld on the basis of an applicable exemption or exclusion, LABP requests that EPA withhold only the portion of information that is subject to that exemption of exclusion. For example, if a particular document contains information that is responsive to this FOIA request and only a portion of that information is subject to a valid exemption of exclusion, LABP requests that EPA redact the exempt portions, but otherwise produce the document.

If you have any questions regarding the processing of this request or need any additional information, please feel free to contact me at (310) 201-7526. Thank you in advance for your cooperation.

Regards,

Sherry E. Jackmar

cc: Jonathan B. Sokol, jsokol@greenbergglusker.com
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